

RE: Post Workshop Comments of AARP

Thank you for organizing the December 7 workshop on downstate electricity resource adequacy.

As we heard from 21 of the 23 parties filing comments, there is no short term resource adequacy issue so there is plenty of time to discuss this matter.

As we noted, many of our 1.7 million members are on low or fixed incomes and have little appetite for costly multiple duplicative subsidies.

We have a surplus of low cost power downstate, in Illinois, and throughout the Midwest. In addition, Illinois is not an island and is well connected to other states which also have a surplus. Plus we have a new state law that requires a 20+% reduction in usage, construction of new renewable resources, and keeping existing nuclear plants (not needed for reliability) running. The cost of the new state law (\$230 million per year for the nuclear subsidy alone) plus a pending Federal grid resiliency surcharge which is estimated to cost \$265 billion over 25 years (and which duplicates the state subsidy) should all be factored into the discussions.

AARP urges the ICC to commission a truly independent analysis of the situation rather than rely on the MISO survey. As we noted at the workshop, MISO is an out of state voluntary membership-based organization which has a duty under its tariff to promote throughput of its members. As the draft report noted, its survey has produced alarmist results. MISO does a good job in dispatching regional generation and eliminating rate pancaking. However, its role should not be expanded to handling state matters such as this.

The University of Illinois or similar institution should be commissioned to do a truly independent assessment of electricity resource adequacy including all planned new generation and transmission as well as possible power plant retirements.

Finally, Illinois should not cede its electrical resource planning role to MISO or any other organization. Only Illinois -not FERC, not MISO, not PJM, nor anyone else-is obliged to focus on the retail rate impacts of proposals.